

# EXHIBIT A

FILED  
 Superior Court of California,  
 Sacramento  
 PLD-PI-001  
 FOR COURT USE ONLY  
 03/10/2022  
 ddonkin  
 By \_\_\_\_\_, Deputy  
 Case Number:  
 34-2022-00316674

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Liana Ter-oganesyan, Esq. (SBN:290266) K & L Associates 433 N. Camden Drive, Suite 600 Beverly Hills, CA 90210 TELEPHONE NO: (424) 205-1860 FAX NO. (Optional): (424) 203-3311 E-MAIL ADDRESS (Optional): liana@kllegalgroup.com ATTORNEY FOR (Name): Jeffrey Nguyen, an Individual		CASE NUMBER:
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 9th Street MAILING ADDRESS: 720 9th Street CITY AND ZIP CODE: Sacramento, CA 95814 BRANCH NAME: Gordon D. Schaber Sacramento County Courthouse		
PLAINTIFF: Jeffrey Nguyen, an Individual  DEFENDANT: CR England, Inc.; Tyrone Duncan;		
<input checked="" type="checkbox"/> DOES 1 TO 50		
<b>COMPLAINT—Personal Injury, Property Damage, Wrongful Death</b> <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input checked="" type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input checked="" type="checkbox"/> Other Damages (specify):		
<b>Jurisdiction (check all that apply):</b> <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		

1. Plaintiff (name or names): Jeffrey Nguyen, an Individual

alleges causes of action against defendant (name or names):  
 CR England Inc.; Tyrone Duncan; DOES 1-50

2. This pleading, including attachments and exhibits, consists of the following number of pages:

3. Each plaintiff named above is a competent adult

a. ☐ except plaintiff (name):

- (1) ☐ a corporation qualified to do business in California
- (2) ☐ an unincorporated entity (describe):
- (3) ☐ a public entity (describe):
- (4) ☐ a minor ☐ an adult
  - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
  - (b) ☐ other (specify):
- (5) ☐ other (specify):

b. ☐ except plaintiff (name):

- (1) ☐ a corporation qualified to do business in California
- (2) ☐ an unincorporated entity (describe):
- (3) ☐ a public entity (describe):
- (4) ☐ a minor ☐ an adult
  - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
  - (b) ☐ other (specify):
- (5) ☐ other (specify):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

BY FAX

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4. ☐ Plaintiff (*name*):  
is doing business under the fictitious name (*specify*):  
  
and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. ☒ **except** defendant (*name*): CR England, Inc.
- (1) ☐ a business organization, form unknown  
(2) ☒ a corporation  
(3) ☐ an unincorporated entity (*describe*):  
  
(4) ☐ a public entity (*describe*):  
  
(5) ☐ other (*specify*):
- c. ☐ **except** defendant (*name*):
- (1) ☐ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (*describe*):  
  
(4) ☐ a public entity (*describe*):  
  
(5) ☐ other (*specify*):
- b. ☐ **except** defendant (*name*):
- (1) ☐ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (*describe*):  
  
(4) ☐ a public entity (*describe*):  
  
(5) ☐ other (*specify*):
- d. ☐ **except** defendant (*name*):
- (1) ☐ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (*describe*):  
  
(4) ☐ a public entity (*describe*):  
  
(5) ☐ other (*specify*):
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☒ Doe defendants (*specify Doe numbers*): 1-25 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (*specify Doe numbers*): 26-50 are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (*names*):
8. This court is the proper court because
- a. ☐ at least one defendant now resides in its jurisdictional area.  
b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.  
c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.  
d. ☐ other (*specify*):
9. ☐ Plaintiff is required to comply with a claims statute, **and**
- a. ☐ has complied with applicable claims statutes, **or**  
b. ☐ is excused from complying because (*specify*):

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Nguyen v. CR England, Inc., et al.

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10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☒ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☐ Other (*specify*):

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☒ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☒ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (*specify*):

Future loss of earnings and future medical expenses for interest as permitted by law.

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. **Plaintiff prays** for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

MV-1; MV-2 and GN-1

Date: 3/9/2022

Liana Ter-oganesyan, Esq.

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

PLD-PI-001(1)

## SHORT TITLE:

Nguyen v. CR England, Inc., et al.

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FIRST

(number)

## CAUSE OF ACTION—Motor Vehicle

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): Jeffrey Nguyen, an Individual

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): February 5, 2020

at (place):

I-5 NorthBound in Sacramento, CA

## MV- 2. DEFENDANTS

a. ☒ The defendants who operated a motor vehicle are (names):

CR England, Inc.; Tyrone Duncan

☒ Does 1 to 50b. ☒ The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names):

CR England, Inc.

☒ Does 1 to 50c. ☒ The defendants who owned the motor vehicle which was operated with their permission are (names):

CR England, Inc.

☒ Does 1 to 50d. ☒ The defendants who entrusted the motor vehicle are (names):

CR England, Inc.

☒ Does 1 to 50e. ☒ The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):

Tyrone Duncan

☒ Does 1 to 50f. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are☒ listed in Attachment MV-2f ☐ as follows:☐ Does \_\_\_\_\_ to \_\_\_\_\_

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SHORT TITLE:  
 Nguyen v. CR England, Inc., et al.

CASE NUMBER:

SECOND

(number)

**CAUSE OF ACTION—General Negligence**Page 5

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Jeffrey Nguyen, an Individual

alleges that defendant (name): CR England, Inc.; Tyrone Duncan

☐ Does 1 to 50

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): February 5, 2020

at (place): I-5 NorthBound in Sacramento, CA

(description of reasons for liability):

On the Aforementioned Date, said Defendant, and/or Defendants, so negligently and recklessly owned, entrusted, operated and maintained defendants' vehicle that they struck Plaintiff's vehicle, with such force as to cause severe property damage to Plaintiff's vehicle, resulting in property damage and severe bodily injury, and intense pain and suffering to plaintiffs.